

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Mingfei Zhu	)	
	)	
Plaintiff,	)	Case No.: 24-cv-01139
v.	)	Judge: Hon. Virginia M. Kendall
	)	
The Partnerships and Unincorporated	)	Magistrate: Hon. Beth W. Jantz
Associations Identified in	)	
Schedule "A",	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF KEVIN J. KEENER**

I, Kevin J. Keener, of Chicago, Illinois, declare as follows:

1. I am over 18 years of age. I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiff's Motion for Entry of a Preliminary Injunction and, if called as a witness, I could and would competently testify as follows:

2. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois, the United States District Court for the Northern District of Illinois.

3. Since and pursuant to the Court's entry of a Temporary Restraining Order in this matter, I have been working with Plaintiff and third party websites to freeze the financial accounts associated with the Infringing Webstores. I have also been working with third party service providers to remove infringing listings or disable the Infringing Webstores.

4. I have received responses from third party service providers and have served all Defendants identified by those third party service providers and filed the return of service [Docket No. #22].

5. Genuine and authentic copies of the unpublished decisions cited in Plaintiff's

Memorandum of Law in Support of Its' Motion for Entry of a Preliminary Injunction are attached hereto as Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 17th day of April, 2024.

/s/ Kevin J. Keener  
Kevin J. Keener